INDEX

	Page
Opinions below	1
Jurisdiction	1
Question presented	2
Statute and Regulations involved	2
Statement	2
Argument	4
Conclusion	11
Appendix	12

CITATIONS

Cases:

Helvering v. *Lerner Stores Corp.*, 314 U.S. 463	8
Hutzler Brothers Co. v. *Commissioner*, 8 T.C. 14	4, 9

Statutes:

Act of September 5, 1950, c. 851, 64 Stat. 592	6, 7, 14
Act of January 11, 1951, c. 1227, 64 Stat. 1244	10, 14, 17
Internal Revenue Code, Sec. 22 (26 U.S.C. 22)	5, 6, 8, 12

Miscellaneous:

H. Rep. No. 2756, 81st Cong., 2d Sess. (U.S. Code Cong. Service, 81st Cong., 2d Sess., Vol. 2, pp. 3576-3577)	7
Mim. 6244, 1948-1 Cum. Bull. 21	4, 9
S. Rep. No. 2366, 81st Cong., 2d Sess. (U.S. Code Cong. Service, 81st Cong., 2d Sess., Vol. 2, pp. 3576-3577)	7
T.D. 5841, 1951-1 Cum. Bull. 11	5, 18
Treasury Regulations 111:	
Sec. 29.22(d)-7	5, 6, 7, 9, 18
Treasury Regulations 118:	
Sec. 39.1	21
Section 39.1-1	9, 21
Sec. 39.22(d)-7	9, 10, 21